

## APPENDIX G: TITLE I COMPARABILITY REPORT SAMPLE AND INSTRUCTIONS

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To be in compliance with the requirements of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 2701 *et seq.*) as amended by the Improving America's School Act, Public Law of 1994, 103-382, §1120A(c), an LEA must assign teachers, administrators, and auxiliary personnel to the schools in such a way that the equivalence of personnel is ensured among schools. (See Section IV, F. Comparability.)

An LEA may receive Title I, Part A funds only if it uses state and local funds to provide services in eligible schools that are, when taken as a whole, at least comparable to the services provided in schools that are *not* receiving Title I-A funds. If the LEA serves all of its schools with Title I-A funds, the LEA must use state and local funds to provide services that are substantially comparable in each Title I-A school.

LEAs must be able to document the comparable services. Comparability may be determined on a grade-span-by-grade-span-basis or a school-by-school basis. The comparability requirements do not apply to an LEA that does not have more than one building for each grade span (single attendance).

### **B. Written Assurance/Comparability Report**

An LEA is deemed to meet the comparability requirements if it files a written assurance (comparability report) with the NJDOE that it has developed and implemented the following three features:

- An LEA-wide salary schedule.
- A policy to ensure equivalence among schools with regard to teachers, administrators, and other staff.
- A policy to ensure equivalence among schools in the provision of curriculum materials and instructional supplies.

An LEA may also meet the comparability requirement using other measures, such as student/instructional staff ratios or student/instructional staff salary ratios shown as Comparability Report examples.

**Note:** An LEA need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of a school year in determining comparability of services.

### ***Preparing a Comparability Report***

A sample Comparability Report is provided at the end of this section. (Blank forms are provided in the Directions for the NCLB application.)

### ***Sample Report***

The sample demonstrates an LEA determining compliance using student/instructional staff ratios or student/instructional staff salary ratios. The sample shows the following comparisons:

- The average number of students per instructional staff in each Title I-A (Project) school with the average number of students per instructional staff in schools not participating in Title I-A programs ( non-Project). A Title I-A school is comparable if its average does not exceed 110 percent of the average of schools not participating in Title I-A programs.
- The average instructional staff salary expenditure per student in each program school with the average instructional staff salary expenditure per student in schools not participating under Title I-A. A Title I-A school is comparable if its average is at least 90 percent of the average of schools not participating in Title I-A programs.

**Note: Staff salary differentials for years of employment shall not be included in comparability determinations (i.e., teacher salaries should be determined at the first step of each pay level). Further, an LEA need not include unpredictable changes in student enrollment or personnel assignments that occur after the beginning of the school year in determining comparability of services. Source documentation must be retained to support all calculations of comparability and to demonstrate that any needed adjustments to staff assignments were made.**

## **C. Maintenance of Procedures and Services**

Every participating LEA must develop procedures for complying annually with the comparability requirements discussed herein, and maintain records (i.e., a Comparability Report that is updated biennially—once every two years) to document its compliance. For instance, if an LEA files a written assurance that it has established and implemented a district-wide salary schedule and policies to ensure equivalence among schools in staffing and in the provision of materials and supplies, it must also keep records documenting that the salary schedule and policies were implemented and that equivalence was achieved among schools in staffing, materials, and supplies.

## **D. Exclusion of Funds**

The comparability rules allow the same exclusion of funds permitted under the supplanting analysis. For the purpose of determining comparability, the LEA may exclude supplemental state and local funds expended in any school attendance area or school for programs that meet the intent and purposes of Title I. The LEA may also exclude funds expended for language instruction educational programs (referred to in the

previous law as “bilingual education for children of limited English proficiency”), as well as the excess cost of providing services to children with disabilities as determined by the LEA.

**ANYTOWN BOARD OF EDUCATION  
SAMPLE COMPARABILITY REPORT FY 2001**

(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Project		Actual			Salaries	Col. 4	Col. 6	If Not
vs. Non- Project		Grade	Pupils	F T E	Excluding	<b>//</b>	<b>//</b>	Comparable
	SCHOOL	Span	Enrolled	Staff	Longevity	Col. 5	Col. 4	Mark " X "
Proj.	Avery Elementary	K-5	450	23.8	\$ 1,052,082.00	19.02	\$ 2,337.96	
Proj.	Baker Elementary	K-5	325	18.8	\$ 844,953.00	17.25	\$ 2,599.86	
Proj.	Chilton Elementary	K-5	400	19.6	\$ 864,740.00	20.41	\$ 2,161.85	
Proj.	Dow Elementary	K-5	525	26.2	\$ 1,053,537.00	20.04	\$ 2,006.74	
Proj.	Elm Elementary	K-5	375	18.0	\$ 774,865.00	20.83	\$ 2,066.31	
Proj.	Forest Elementary	K-5	650	31.4	\$ 1,440,454.00	20.70	\$ 2,216.08	
Non	Newtown Elementary	K-5	550	23.4	\$ 994,535.00	3.50	\$ 1,808.25	
Non	Pleasant Elementary	K-5	425	21.4	\$ 961,483.00	9.86	\$ 2,262.31	
Non	Sage Elementary	K-5	600	29.3	\$ 1,270,475.00	0.48	\$ 2,117.46	
Non	Tasker Elementary	K-5	400	23.3	\$ 1,050,708.00	17.17	\$ 2,626.77	
Non	Venice Elementary	K-5	600	29.6	\$ 1,223,139.00	20.27	\$ 2,038.57	
Non	Wilson Elementary	K-5	650	33.5	\$ 1,425,689.00	19.40	\$ 2,193.37	
			Average	Aver.	Average	Col. 7A	Col. 8A	
Average of lower group of schools			538	27	1,154,338	20.09	\$ 2,147.61	
						Col. 7B	Col. 8B	
					(110 % of 7A)	2.10	\$ 1,932.85	(90 % of 8A)

**NOTES:**

Column 7 for each project school must be less than or equal to Column 7B  
Column 8 for each project school must be more than or equal to Column 8B

Some schools in grade span are PROJECT  
and some are NON-PROJECT  
Compare PROJECT to NON-PROJECT